



Eric Gonzalez
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KINGS COUNTY**

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Cydney Korek
Assistant District Attorney

September 14, 2020

[REDACTED]

Re: [REDACTED]
[REDACTED]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JOHN SULLIVAN

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure #1:

ON NOVEMBER 19, 2015, AT ABOUT 11:42 P.M., NEAR BROADWAY AND MADISON STREET IN BROOKLYN, MOS JOHN SULLIVAN, ARRESTED AN INDIVIDUAL ("DEFENDANT A") FOR PATRONIZING A PERSON FOR PROSTITUTION IN THE THIRD DEGREE, AFTER UNDERCOVER OFFICER (UC) 2322, WHO WAS POSING AS A PERSON FOR PROSTITUTION, POINTED THE INDIVIDUAL OUT TO AN UNDERCOVER OFFICER ACTING AS A "GHOST."

ON NOVEMBER 20, 2015, AT ABOUT 2:15 A.M., NEAR THE SAME LOCATION, MOS SULLIVAN ARRESTED ANOTHER INDIVIDUAL ("DEFENDANT B") FOR PATRONIZING A PERSON FOR PROSTITUTION IN THE THIRD DEGREE, AFTER UC 2322 MADE AN IDENTIFICATION.

THAT SAME DAY, NOVEMBER 20TH, MOS SULLIVAN COMPLETED PAPERWORK TO PROCESS THESE ARRESTS. WITH REGARD TO THE FIRST, MOS SULLIVAN SIGNED PAGE 2 OF A SUPPORTING DEPOSITION, IN WHICH HE STATED THAT ON NOVEMBER 19, 2015, UC "2322" IDENTIFIED DEFENDANT A TO HIM "AS THE PERSON WHOM HE/SHE HAD OBSERVED PERFORM THE ACTIONS DESCRIBED ABOVE IN PAGE 1." MOS SULLIVAN SUBSEQUENTLY SPOKE TO AN ASSISTANT DISTRICT ATTORNEY PREPARING THE CASE FOR TRIAL AND STATED THAT UNDERCOVER OFFICER 2322 HAD NOT IN FACT IDENTIFIED DEFENDANT A TO HIM (SULLIVAN), AS HE HAD PREVIOUSLY STATED ON THE SUPPORTING DEPOSITION PAGE 2, BUT RATHER UC 2322 HAD IDENTIFIED DEFENDANT A TO ANOTHER OFFICER. THE PEOPLE FILED A NEW IDENTIFICATION NOTICE FOLLOWING THIS CONVERSATION.

ADDITIONALLY, AT A LATER DATE, ANOTHER ADA SPOKE WITH UC 2322 ABOUT DEFENDANT A'S CASE. PAGE 1 OF THE SUPPORTING DEPOSITION (MOS SULLIVAN HAD SIGNED PAGE 2) PURPORTED TO BE THE SUPPORTING DEPOSITION OF UC 2322, IN THAT IT BORE HER UC SHIELD NUMBER, "2322," ON THE SIGNATURE LINE NEXT TO THE DATE OF "11/20/15" AND IT CONTAINED THE STATEMENT THAT "I, UC 2322" OBSERVED DEFENDANT A AGREE TO PAY A FEE OF \$20 TO ENGAGE IN VAGINAL INTERCOURSE. UC 2322 INFORMED THE ADA THAT SHE HAD NOT WRITTEN HER UNDERCOVER NUMBER ON THE SIGNATORY LINE OF SUPPORTING DEPOSITION PAGE 1. AT THE TIME, THE PEOPLE CONCLUDED THAT MOS SULLIVAN HAD WRITTEN THE UC'S SHIELD NUMBER "2322" ON THE PAGE 1 SIGNATURE LINE, AND THE PEOPLE SUBSEQUENTLY DISMISSED THE CASE AGAINST DEFENDANT A.

AFTER CONCLUDING THAT THERE WERE ERRORS IN THE SUPPORTING DEPOSITION PAGE 1 AND PAGE 2 IN THE CASE OF DEFENDANT A, STAFF OF THE DISTRICT ATTORNEY'S OFFICE CONCLUDED THAT PAGE 1 OF THE SUPPORTING DEPOSITION IN DEFENDANT B'S CASE, WHICH PURPORTED TO BE COMPLETED AND SIGNED BY UC "2322," HAD ALSO BEEN FILLED OUT BY MOS SULLIVAN. THE PEOPLE DISMISSED THE CASE AGAINST DEFENDANT B.

AT AN APRIL 2016 COURT PROCEEDING PERTAINING TO AN UNRELATED CASE, MOS SULLIVAN ACKNOWLEDGED THAT HE HAD WRITTEN THE UC'S SHIELD NUMBER ON THE SIGNATORY LINE FOR THE SUPPORTING DEPOSITIONS IN THE TWO PATRONIZING CASES (DEFENDANTS A AND B) MENTIONED ABOVE.

Disclosure #2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 05/05/2014, AGAINST MOS SULLIVAN:

1. COURT - NON-APPEARANCE - TRAFFIC VIOLATIONS BUREAU
ACTION TAKEN: SCHEDULE A COMMAND DISCIPLINE ISSUED.

Disclosure #3:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, ARISING FROM AN INCIDENT ON OR ABOUT 01/28/2016, AGAINST MOS SULLIVAN:

1. MOS SULLIVAN VIOLATED PATROL GUIDE PROCEDURE IN THAT HE FAILED TO PREPARE A COMPLAINT REPORT WORKSHEET UPON RESPONDING TO THE SCENE OF AN ATTEMPTED BURGLARY REPORTED BY AN INDIVIDUAL KNOWN TO THE DEPARTMENT. OFFICER SULLIVAN ALSO ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY OR DISCIPLINE OF THE DEPARTMENT, TO WIT: HE TRANSMITTED OR WAS COMPLICIT IN THE TRANSMISSION OF A RADIO DISPOSITION IN DICTATING THAT THE COMPLAINANT WAS "GONE ON ARRIVAL" WHEN IN FACT THE COMPLAINANT WAS PRESENT AT THE SCENE IN VIOLATION OF THE PATROL GUIDE.

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE ISSUED, WARNED AND ADMONISHED.
CASE CLOSED ON 7/25/17

Disclosure #4:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION, DATED 10/16/2017, AGAINST MOS SULLIVAN:

1. REPORT INCOMPLETE/INACCURATE- OTHER REPORT

IN ADDITION, THE NYPD ENTERED A DISPOSITION OF MINOR PROCEDURAL VIOLATION, DATED 10/16/2017, AGAINST MOS SULLIVAN:

2. MEMOBOOK INCOMPLETE/IMPROPER

ACTION TAKEN: LETTER OF INSTRUCTION

CASE STATUS: CLOSED ON 09/20/2017

THE PEOPLE ARE UNAWARE OF ANY PENDING OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County